IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN RE:)
JOHN JASPER HATCHER SR. AKA JOHN J. HATCHER) Case No. 17-34119-KLP) Chapter 13
Debtor	_)
U.S. BANK TRUST, N.A.)
Movant)
v.)
JOHN JASPER HATCHER SR., ET AL.)
Respondents)

DEBTOR'S OBJECTION TO NOTICE OF DEFAULT

COMES NOW the Debtor, by counsel, and as and for his Objection to the Notice of Default filed herein ("Notice"), states as follows:

- 1. The Debtor admits that he is delinquent in the payment of the regular monthly payments as set forth in the Notice.
- 2. The Debtor is able to cure the default in the amount of \$3,135.90 on or before March 27, 2020.
- 3. The Debtor is requesting a hearing in connection with the Notice to request additional time to cure the defaults alleged therein.

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WHEREFORE, the Debtor respectfully requests that relief from the automatic stay be denied and that the Court grant him additional time to cure the defaults alleged in the Notice of Default, and for such other relief as the Court deems appropriate.

JOHN JASPER HATCHER SR., ET AL.

By: /s/ James E. Kane Counsel

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Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof.

/s/ James E. Kane

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